

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

LUIS SEGOVIA, <i>et al.</i> ,)	
)	
)	
Plaintiffs,)	
)	15-cv-10196
v.)	
)	Judge Joan B. Gottschall
BOARD OF ELECTION COMMISSIONERS)		
FOR THE CITY OF CHICAGO, <i>et al.</i> ,)	
)	
Defendants.)	

CONSENT MOTION FOR A REVISED SCHEDULING ORDER

Defendants the United States of America, Federal Voting Assistance Program, Director Matt Boehmer in his official capacity, and Secretary of Defense Ashton Carter in his official capacity (collectively the “Federal Defendants”) respectfully move the Court for a revised scheduling order in light of Federal Defendants’ Cross-Motion for Summary Judgment. The Federal Defendants have conferred with all parties and no party objects.

Plaintiffs filed the Complaint on November 10, 2015. ECF No. 1. On December 7, 2015 and December 8, 2015, defendants Board of Election Commissioners for the City of Chicago, Langdon Neal,¹ and Karen Kinney (the “State Defendants”) answered the Complaint. ECF Nos. 27 and 30. On February 10, 2016, the Federal Defendants moved to dismiss the Complaint. ECF No. 42. On March 16, 2016, Plaintiffs filed an Opposition to the Federal Defendants’ Motion to Dismiss and a Motion for Summary Judgment. ECF No. 47. On April 18, the Federal Defendants filed a combined Reply in Support of their Motion to Dismiss, Opposition to Plaintiffs’ Motion for Summary Judgment, and Cross-Motion for Summary Judgment. ECF No.

¹ Defendant Neal was named in his official capacity as Chairman of the Board of Election Commissioners for the City of Chicago but relinquished this position at the end of 2015. The current Chairman, Marisel. A. Hernandez, has since been substituted in his place. (ECF No. 37).

50. The Federal Defendants propose the following briefing schedule so that the Court may consider all dispositive issues at once. No party objects to the following schedule:

Plaintiffs file a combined Reply in Support of their Motion for Summary Judgment and Opposition to the Federal Defendants' Cross Motion for Summary Judgment: **May 3, 2016**

Federal Defendants file a Reply in Support of their Cross-Motion for Summary Judgment: **May 17, 2016**

For the foregoing reasons, the Federal Defendants respectfully request that the Court enter the proposed scheduling order.

Date: April 19, 2016

Respectfully submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

ANTHONY J. COPPOLINO
Deputy Branch Director

ZACHARY T. FARDON
United States Attorney

THOMAS WALSH
Assistant United States Attorney

/s/ Caroline Anderson
Caroline J. Anderson
IL Bar No. 6308482
Trial Attorney
U.S Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7220
Washington, D.C. 20001
Phone: (202) 305-8645
Caroline.J.Anderson@usdoj.gov

Counsel for Federal Defendants